



(REDACTED VERSION)

March 31, 2016

Ms. Sara Clark
Department Secretary
Massachusetts Department of Telecommunications and Cable
Cable Television Division
1000 Washington Street, 8th Floor, Suite 820
Boston, MA 02118-6500

RE: Comcast Cable Communications, LLC
Docket No. D.T.C. 15-3
FCC Forms 1240 and 1205
Responses to First Set of Information Requests

Dear Ms. Clark:

Enclosed are an original and three (3) copies of Comcast's response to the First Set of Information Requests issued March 17, 2016 by the Department of Telecommunication & Cable, regarding Comcast Cable Communications, LLC's FCC Form 1205 and FCC Form 1240s submitted on October 1, 2015.

Accompanying this response is a Motion for Protective Treatment of Confidential Information. The redacted version of this response will be sent to the Intervenors.

If you have any questions regarding this information, please contact me at 610-665-2536.

Sincerely,

A handwritten signature in black ink, appearing to read "James G. Gray".

James G. Gray
Senior Director of Regulatory Accounting
Comcast Cable Communications, LLC

/enclosures

Commonwealth of Massachusetts
Department of Telecommunications and Cable
Cable Television Division
Docket No. DTC 15-3

**MOTION OF COMCAST CABLE COMMUNICATIONS, LLC FOR PROTECTIVE
TREATMENT OF CONFIDENTIAL INFORMATION**

Comcast Cable Communications, LLC (“Comcast”) hereby requests that the Department of Telecommunications and Cable (the “Department”) grant this motion to provide confidential treatment for certain information provided in this proceeding involving the Department’s investigation of Comcast’s proposed basic service tier programming, equipment and installation rates (*See* D.T.C. 15-3). Specifically, Comcast requests that confidentiality be afforded to portions of the responses to Information Request 1-3, which provides detailed information regarding Comcast’s retransmission consent fees in its Massachusetts regulated franchise areas. As grounds for this request, Comcast states that the retransmission consent fee information is confidential, competitively sensitive and proprietary information under G.L. c.25C § 5.

I. Standard of Review

Confidential information may be protected from public disclosure in accordance with G.L. c. 25C § 5, which provides in part that:

[T]he department may protect from public disclosure trade secrets, confidential, competitively sensitive or other proprietary information provided in the course of proceedings conducted pursuant to this chapter. There shall be a presumption that the information for which such protection is sought is public information and the burden shall be on the proponent of such protection to prove the need for such protection. Where such a need has been found to exist, the department shall protect only so much of the information as is necessary to meet such need.

The Department has previously recognized that competitively sensitive information is entitled to protective status. Indeed, the Department has provided confidential treatment for similar information in prior rate reviews. *See, e.g., Hearing Officer’s Ruling on Motion of Comcast Cable Communications, LLC*, Tr. 8, D.T.C. 10-8 (August 3, 2011) (“*Comcast Protective Order I*”), *Hearing Officer Ruling on Motion for Protective Order*, DTC 12-2 (Nov. 27, 2012) (“*Comcast Protective Order II*”), *Hearing Officer’s Ruling on Motion for Protective Treatment of Confidential Information*, DTC 13-5 (Feb. 14, 2014) (“*Comcast Protective Order III*”), and *Hearing Officer’s Ruling on Motion for Protective Treatment of Confidential Information*, DTC 14-4 (Aug. 6, 2015) (“*Comcast Protective Order IV*”).

II. Argument

The Department sets forth a three-part standard for determining the applicability of G.L. c. 25C § 5. First, the information for which protective treatment is sought must constitute the type of information that can be exempted from public disclosure (e.g., trade secrets, confidential or competitively sensitive or other proprietary information). The retransmission consent fee information requested by the Department is considered by Comcast to be proprietary and commercially sensitive information. This information is not otherwise publicly available to Comcast's competitors. Public disclosure of this information would provide competitors with cost information giving them an unfair competitive advantage. Moreover, this information could form the basis for pricing and market strategies by competitors. In addition, release of this information could also disadvantage the parties to these contracts (including entities that are not the subject of this proceeding) in their pricing negotiations with third parties. Finally, the Department has ruled in the past that these types of costs are confidential information and exempt from public disclosure. *See, e.g., Comcast Protective Order I; Comcast Protective Order II, Comcast Protective Order III; Hearing Officer's Ruling on the Motion of Coxcom, Inc., d/b/a Cox Communications New England for Protective Order, D.T.C. 08-8 (2009). See also Comcast Protective Order IV at p. 5 ("The Department agrees that disclosure of channel or broadcaster specific programming costs could unfairly put Comcast in a precarious competitive position."*)

Second, the party seeking protection must overcome the presumption that the material is public in nature and prove the need for non-disclosure of the information. As noted above, the information the Department is requesting is not publicly available. Moreover, Comcast maintains contractual relationships with the broadcasters carried on its systems. Under these contracts, Comcast is prohibited from publicly disclosing the terms and conditions, including the fees paid. As such, disclosure of this information to the Department without the grant of protective treatment would violate Comcast's contractual agreements with broadcasters.

Comcast and broadcasters clearly treat this type of cost material as confidential and competitively sensitive. Comcast's business practices ensure that proprietary, commercially sensitive information of this nature is not disclosed to any third party in the ordinary course of business, unless under the umbrella of a non-disclosure agreement. In fact, the Department has recently ruled that the "Department regularly accords confidential treatment to this type of information." *See Comcast Protection Order IV at p. 8.*

Third, and finally, where a need for protective treatment has been established, the Department may limit the time period the non-disclosure of the information is in effect. Comcast requests that, if the Department is absolutely compelled to limit the period of confidentiality, the Department treat these materials as having confidential status for at least five (5) years, with an opportunity to renew its request for confidential treatment at the end of that five year period based upon a showing of need for continuing protection. *See Comcast Protective Order IV at p. 10.* Comcast submits that a minimum five-year period is absolutely necessary to ensure that these materials will not be of such great competitive value to Comcast's competitors.

III. Conclusion

For these reasons, Comcast requests that the Department grant protection from public disclosure of the confidential information submitted in this proceeding in accordance with G.L. c. 25C §5. Should the Department have any concerns regarding the grant of protection from public disclosure for these materials, or if any request by a third party is made for access to these documents, Comcast respectfully requests notification to the undersigned to amend and/or clarify Comcast's request for confidential treatment *before* the Department releases the information.

Respectfully submitted,

COMCAST CABLE COMMUNICATIONS, LLC

By: _____ / s / _____

Steven J. Horvitz
Davis Wright Tremaine LLP
1919 Pennsylvania Ave., N.W., Suite 800
Washington, D.C. 20006
(202) 973-4228

April 1, 2016

Commonwealth of Massachusetts
Department of Telecommunications and Cable
Cable Television Division
Docket No. DTC 15-3

D.T.C. 1-1 Referring to the Labor Cost and Policy Changes and Schedule B of Comcast's FCC Form 1205:

- a. Identify whether the commissions and the time element associated with the installation of the drop for unwired installations are removed as required by the Department in C.T.V 04-3/04-4.
- b. If the commissions and the time element associated with the installation of the drop for unwired installations are not removed, provide a FCC Form 1205 revised to comply with the Department's Order in C.T.V. 04-3/04-4.

RESPONSE:

Please see the attached revised FCC Form 1205 (Exhibit 1-1) in compliance with the Department's Order in C.T.V 04-3/04-4. Commissions and the time element associated with the installation of the drop for unwired installations have been removed.

RESPONSIBLE WITNESS: Warren Fitting

FORM 1205
DETERMINING REGULATED EQUIPMENT AND INSTALLATION COSTS
"EQUIPMENT FORM"

Comcast - Working Copy

Community Unit Identifier (CUID) of cable system SEE FCC FORM 1240 FILING	Date of Form Submission 03/01/15	
Name of Cable Operator COMCAST CABLE COMMUNICATIONS, LLC		
Mailing Address of Cable Operator		
City	State	ZIP Code
Name and Title of person completing this form:		
Telephone number	Fax Number	

Name of Local Franchising Authority PLEASE SEE FRANCHISE AUTHORITY LISTING PROVIDED WITH FCC FORM 1240 FILING		
Mailing Address of Local Franchising Authority		
City	State	ZIP Code

1. This form is being filed: [Enter an "x" in the appropriate box]

In conjunction with FCC Form 1200, FCC Form 1220, or FCC Form 1225.

Attach the completed FCC Form 1200, FCC Form 1220, or FCC Form 1225 to the front of this form.

OR

In order to fulfill FCC rules requiring an annual filing of this form

(mm/dd/yy)

Note: This should be the date on which the rates last justified, by using either FCC Form 393 or the prior filing of this form, were in effect.

2. Enter the date on which you closed your books for the fiscal year reflected in this form:

(mm/dd/yy)

Note: This will indicate the end of the 12-month fiscal year for which you are filing this form.

3. Indicate the corporate status of your cable system [Enter an "x" in the correct box]

- | |
|---|
| <input checked="" type="checkbox"/> C-Corporation |
| <input type="checkbox"/> Subchapter S corporation |
| <input type="checkbox"/> Partnership |
| <input type="checkbox"/> Sole Proprietorship |
| <input type="checkbox"/> Other [Please explain below] |

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SCHEDULE A: CAPITAL COSTS OF SERVICE INSTALLATION AND MAINTENANCE OF EQUIPMENT AND PLANT					
	Equipment and Plant	Vehicles	Tools	Maintenance Facilities	Other 1. (Specify below)
A					Other 2. (Specify below)
B	Gross Book Value	\$778,908,342.00	\$402,441,875.00	\$0.00	
C	Accumulated Depreciation	\$702,081,470.00	\$313,947,652.00	\$0.00	
D	Deferred Taxes	\$2,915,671.00	(\$2,863,615.00)	\$0.00	
E	Net Book Value [B-(C+D)]	\$73,911,201.00	\$91,357,838.00	\$0.00	\$0.00
F	Rate of Return	0.1125			
G	Calculation of Gross-up Rate				
G1	Federal Income Tax Rate	0.35			
G2	State Income Tax Rate	0.0699			
G3	Net Total Income Tax Rate [(G1+G2)-(G1 x G2)]	0.3954			
G4	Adjustment to Reflect Interest Deductibility				
G4a	Actual Interest Amount	\$2,617,000,000.00			
G4b	Total Net Assets	\$118,492,000,000.00			
G4c	Base Return on Investment Amount [G4b x F]	\$13,330,350,000.00			
G4d	Interest Deductibility Factor [G4a/G4c]	0.1963			
G5	Effective Tax Rate [G3 x (1-G4d)] [C-Corps skip to G7]	0.3178			
G6	Adjustments for Non-C Corporations				
G6a	Base Return on Investment Amount [G4c]	n/a			
G6b	Distributions	\$0.00			
G6c	Contributions (may not exceed G6b)				
G6d	Returns Subject to Income Tax [G6a-G6b+G6c]	n/a			
G6e	Returns Percentage Subject to Income Tax [G6d/G6a]	n/a			
G7	Gross-Up Rate [C-Corps:1/(1-G5) Other:1/(1-(G3 x G6c))]	1.4659			
H	Grossed-Up Rate of Return [F x G7]	0.1649			
I	Return on Investment Grossed-Up for Taxes[E x H]	\$12,188,587.3651	\$15,065,686.5926	\$0.00	\$0.00
J	Current Provision for Depreciation	\$50,900,043.34	\$49,879,798.55	\$0.00	
K	Annual Capital Costs [I+J]	\$63,088,630.7051	\$64,945,485.1426	\$0.00	\$0.00
L	GRAND TOTAL [sum of Line K entries]	\$128,034,115.8477			

Box 1.

Specify: Other 1.

Specify: Other 2.

SCHEDULE B: ANNUAL OPERATING EXPENSES FOR SERVICE INSTALLATION AND MAINTENANCE OF EQUIPMENT						
	Salaries & Benefits	Supplies	Utilities	Other Taxes	Other 1. (Specify below)	Other 2. (Specify below)
A	Annual Op. Expenses for Svc. Install. and Maint. of Equip.	\$4,781,054,372.90	\$14,922,041.07	\$0.00	\$0.00	\$316,998,009.32
B	GRAND TOTAL [sum of Line A entries]	\$5,471,228,302.93				\$358,253,879.64

Box 2.

Specify: Other 1. Contract Labor / Converter Maintenance

Specify: Other 2. Vehicle Expenses / Rentals and Lease Expense

EXHIBIT 1-1, PAGE 2

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SCHEDULE C: CAPITAL COSTS OF LEASED CUSTOMER EQUIPMENT							
A	Equipment	Remote 1	Remote 2	CableCARD	Converter 1	Converter 2	Converter 3
B	Total Maintenance/Service Hours (Attach Explanation)	546,263		28,917	193,098	6,076,069	4,080,914
C	Total # of Units in Service	35,736,512		347,009	1,100,728	34,635,784	23,262,681
D	Gross Book Value	\$206,409,889.00		\$22,246,032.77	\$192,557,819.6935	\$9,143,307,354.30	\$1,306,256,862.00
E	Accumulated Depreciation	\$147,679,178.00		\$17,759,497.22	\$158,115,413,6136	\$6,571,034,307.39	\$840,159,803.00
F	Deferred Taxes	(\$24,996,946.00)		\$269,807.00	\$4,633,022.00	\$327,854,144.00	\$77,424,786.00
G	Net Book Value [D-(E+F)]	\$83,727,657.00	\$0.00	\$4,216,728.55	\$29,809,384,0799	\$2,244,418,902.91	\$388,672,273.00
H	Grossed-Up Rate of Return [From Sched. A, Line H]	0.1649					
I	Return on Investment Grossed-Up for Taxes [G x H]	\$13,807,404.6749	\$0.00	\$695,374,4985	\$4,915,821,6514	\$370,123,817,6599	\$64,095,372,4435
J	Current Provision for Depreciation	\$59,767,082.65		\$1,751,945.72	\$15,019,161,0591	\$895,154,983.12	\$245,084,382.80
K	Annual Capital Costs [I + J]	\$73,574,487.3249	\$0.00	\$2,447,320,2185	\$19,934,982,7105	\$1,265,278,800,7799	\$309,179,755,2435
L	GRAND TOTAL [sum of Line K entries]	\$1,670,415,346,2773					

Box 3.

SCHEDULE D: AVERAGE HOURS PER INSTALLATION	
A. Average Hours per Unwired Home Installation (attach an explanation)	0.9078
B. Average Hours per Pre-Wired Home Installation (attach an explanation)	0.8583
C. Average Hours per Additional Connection Installation at Time of Initial Installation (attach an explanation)	0.4021
D. Average Hours per Additional Connection Installation Requiring Separate Installation (attach an explanation)	0.9396
E. Other Installation (by Item Type):	
Item 1. Relocate Outlet-Initial	
Average Hours per Installation (attach an explanation)	0.4033
Item 2. Upgrade Non-Addressable	
Average Hours per Installation (attach an explanation)	0.834
Item 3. Downgrade Non-Addressable	
Average Hours per Installation (attach an explanation)	0.3527

EXHIBIT 1-1, PAGE 3

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WORKSHEET FOR CALCULATING PERMITTED EQUIPMENT AND INSTALLATION CHARGES	
STEP A. Hourly Service Charge	
1. Total Capital Costs of Installation and Maintenance [Schedule A, Box 1]	\$128,034,115.8477
2. Total Annual Operating Expenses for Installation and Maintenance [Schedule B, Box 2]	\$5,471,228,302.93
3. Total Capital Costs and Operating Expenses for Installation and Maintenance [Line 1 + Line 2].	\$5,599,262,418.7777
4. Customer Equipment and Installation Percentage (attach an explanation).	0.1360
5. Annual Customer Equipment Maintenance and Installation Costs, Excluding Costs of Leased Equipment [Line 3 x Line 4]	\$761,366,691.00
6. Total Labor Hours for Maintenance and Installation of Customer Equipment and Services (attach explanation)	21,540,451.53
7. Hourly Service Charge (HSC) (Line 5/Line 6)	\$35.3459

METHOD OF BILLING FOR INSTALLATIONS (place an "x" in the appropriate box)

Installations billed by the hour based on the HSC calculated in Line 7.
 Installations billed as a standard charge.

STEP B. Installation Charge

8. Uniform HSC for all installations (From Step A, line 7)	n/a
OR	
9. Average Charge for Installation Types	
a. Unwired Home Installation	
a1. HSC [Line 7]	\$35.3459
a2. Average Hours per Unwired Home Installation (Schedule D, Line A)	0.9078
a3. Charge per Unwired Home Installation [a1 x a2]	\$32.087
b. Pre-wired Home Installation	
b1. HSC [Line 7]	\$35.3459
b2. Average Hours per Pre-wired Home Installation (Schedule D, Line B)	0.8583
b3. Charge per Pre-wired Home Installation [b1 x b2]	\$30.3374
c. Additional Connection Installation at Time of Initial Installation	
c1. HSC [Line 7]	\$35.3459
c2. Average Hours per Additional Connection Installation at Time of Init. Install. [Schedule D, Line C]	0.4021
c3. Charge per Additional Connection Installation at Time of Initial Installation [c1 x c2]	\$14.2126
d. Additional Connection Installation Requiring Separate Installation	
d1. HSC [Line 7]	\$35.3459
d2. Avg. Hours per Additional Connection Installation Req. Sep. Install. [Schedule D, Line D]	0.9396
d3. Charge per Additional Connection Installation Requiring Separate Installation [d1 x d2]	\$33.211
e. Other Installations (As specified in Schedule D, Line E):	
e1. HSC [Line 7]	\$35.3459
e2. Average Hours per Installation of Item 1 [Relocate Outlet-Initial]	0.4033
e3. Charge per Installation of Item 1 [e1 x e2]	\$14.255
e4. HSC [Line 7]	\$35.3459
e5. Average Hours per Installation of Item 2 [Upgrade Non-Addressable]	0.834
e6. Charge per Installation of Item 2 [e4 x e5]	\$29.4785
e7. HSC [Line 7]	\$35.3459
e8. Average Hours per Installation of Item 3 [Downgrade Non-Addressable]	0.3527
e9. Charge per Installation of Item 3 [e7 x e8]	\$12.4665

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STEP C. Charges for leased Remotes (Calculate separately for each significantly different type)		a Remote 1	b Remote 2	c Cable Card
10. Total Maintenance/Service Hours [Corresponding column from Schedule C, Line B]		\$46,263	0.	28,917
11. HSC [Line 7]		\$35,3459	\$35,3459	\$35,3459
12. Total Maintenance/Service Cost [Line 10 x Line 11]		\$19,308,158.5196	\$0.00	\$1,022,097.4511
13. Annual Capital Costs [Corresponding column from Schedule C, Line K]		\$73,574,487.3249	\$0.00	\$2,447,320.2185
14. Total Cost of Remote [Line 12 + Line 13]		\$92,882,645.8446	\$0.00	\$3,469,417.6695
15. Number of Units in Service [Corresponding column from Schedule C, Line C]		35,736,512	0.	347,009
16. Unit Cost [Line 14/Line 15]		\$2,5991	\$0.00	\$9,9981
17. Rate per Month [Line 16/(12)]		\$0.2166	\$0.00	\$0.8332

STEP D. Charges for leased Converter Boxes (Calculate separately for each significantly different type)		a Converter 1	b Converter 2	c Converter 3
18. Total Maintenance/Service Hours [Corresponding column from Schedule C, Line B]		193,098	6,076,069	4,080,914
19. HSC [Line 7]		\$35,3459	\$35,3459	\$35,3459
20. Total Maintenance/Service Cost [Line 18 x Line 19]		\$6,825,223.004	\$214,764,140.0355	\$144,243,586.7284
21. Annual Capital Costs [Corresponding column from Schedule C, Line K]		\$19,934,982.7105	\$1,265,278,800.7799	\$309,179,755.2435
22. Total Cost of Converter [Line 20+Line 21]		\$26,760,205.7145	\$1,480,042,940.8154	\$453,423,341.9719
23. Number of Units in Service [Corresponding column from Schedule C, Line C]		1,100,728	34,635,784	23,262,681
24. Unit Cost [Line 22/Line 23]		\$24.3114	\$42.7316	\$19.4914
25. Rate per Month [Line 24/(12)]		\$2,0259	\$3.561	\$1.6243

STEP E. Charges for Other Leased Equipment	
26. Total Maintenance/Service Hours [Corresponding column from Schedule C, Line B]	0.
27. HSC [Line 7]	\$35,3459
28. Total Maintenance/Service Cost [Line 26 x Line 27]	\$0.00
29. Annual Capital Costs [Corresponding column from Schedule C, Line K]	\$0.00
30. Total Cost of Equipment [Line 28+Line 29]	\$0.00
31. Number of Units in Service [Corresponding column from Schedule C, Line C]	0.
32. Unit Cost [Line 30/Line 31]	\$0.00
33. Rate per Month [Line 32/(12)]	\$0.00

METHOD OF BILLING FOR CHANGING SERVICE TIERS OR EQUIPMENT [place an "x" in the appropriate box]	
<input type="checkbox"/>	as a Nominal Charge (Enter the nominal charge in Line 34)
<input type="checkbox"/>	as a Uniform Hourly Service Charge
<input checked="" type="checkbox"/>	as an Average Charge (Enter the Average Hours for Changing Service Tiers in Line 36b.)

STEP F. Charges for Changing Service Tiers or Equipment	
34. Nominal Charge for Changing Service Tiers	
If you use an escalating scale of charges, place an "x" in the box at the right.	
OR	
35. Uniform Hourly Service Charge	n/a
OR	
36. Average Charge for Changing Service Tiers	
36a. HSC [Line 7]	\$35,3459
36b. Average Hours to Change Service Tiers	0.834
36c. Average Charge for Changing Service Tiers [Line 36a x Line 36b]	\$29,4785

EXHIBIT 1-1, PAGE 5

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WORKSHEET FOR CALCULATING TOTAL EQUIPMENT AND INSTALLATION COSTS	
1. Total Capital Costs of Installation and Maintenance [Schedule A, Box 1]	\$128,034,115.8477
2. Total Annual Operating Expenses for Installation and Maintenance [Schedule B, Box 2]	\$5,471,228,302.93
3. Total Annual Capital Costs of Installation and Maintenance [Line 1 + Line 2]	\$5,599,262,418.7777
4. Customer Equipment and Installation Percentage (attach explanation).	
5. Annual Customer Equipment Maintenance and Installation Costs, Excluding Costs of Leased Equipment [Line 3 x Line 4]	\$0.00
6. Total Capital Costs of Leased Customer Equipment [Schedule C, Box 3]	\$1,670,415,346.2773
7. Annual Customer Equipment and Installation Costs [Line 5 + Line 6]	\$1,670,415,346.2773
8. Percentage Allocation to Franchise Area (see instructions)	
9. Allocated Annual Equipment and Installation Cost [Line 7 x Line 8]	\$0.00
10. Monthly Equipment and Installation Cost [Line 9 / (12)]	\$0.00
11. Number of Basic Subscribers in Franchise	
12. Monthly Equipment and Installation Cost per Subscriber [Line 10 / Line 11]	\$0.00
13. Inflation Adjustment Factor [See Instructions]	
14. Adjusted Monthly Equipment and Installation Cost per Subscriber [Line 12 x Line 13]	\$0.00

EXHIBIT 1-1, PAGE 6

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SUMMARY SCHEDULE

Current Equipment and Installation Rates	Permitted	Actual
1. Charges for Cable Service Installations		
a. Hourly Rate [Step A, Line 7]	n/a	
b. Average Installation Charges:		
1. Installation of Unwired Homes [Step B, Line 9a3]	\$32.09	*
2. Installation of Premises Homes [Step B, Line 9b3]	\$30.34	*
3. Installation of Additional Connections at Time of Initial Installation [Step B, Line 9c3]	\$14.21	*
4. Installation of Additional Connections Requiring Separate Install [Step B, Line 9d3]	\$33.21	*
5. Other Installations (specify) [Step B, Lines 9e3, 9e6, 9e9]		
a. Relocate Outlet-Initial	\$14.26	*
b. Upgrade Non-Addressable	\$29.48	*
c. Downgrade Non-Addressable	\$12.47	*
2. Monthly Charge for Lease of Remote Controls [Step C, Line 17, columns a-c]		
Remote Control Type 1: All Units	\$0.22	*
Remote Control Type 2:	\$0.00	
Remote Control Type 3: CableCARD	\$0.83	*
3. Monthly Charge for Lease of Converter Boxes [Step D, Line 25, columns a-c]		
Converter Box Type 1: (Basic Only Units)	\$2.03	*
Converter Box Type 2: (All Others Excluding Basic Only and DTA)	\$3.56	*
Converter Box Type 3: (DTA)	\$1.62	*
4. Monthly Charge for Lease of Other Equipment [Step E, Line 33]		
Other Equipment	\$0.00	*
5. Charge for Changing Tiers (if any) [Step F, Line 34, 35 or 36c]	\$29.48	*

LABOR COST AND POLICY CHANGES

Indicate your answer to the following three questions by placing an "x" in the appropriate box

1. Have you included the labor costs associated with subscriber cable drops in your charges for initial installation?

<input checked="" type="checkbox"/>	YES
<input type="checkbox"/>	NO

2. Have you capitalized the labor costs associated with subscriber cable drops?

<input checked="" type="checkbox"/>	YES
<input type="checkbox"/>	NO

3. If you have filed this form before, have you changed any policy, e.g., cost accounting or cost allocation that causes an increase in the costs included in the computation of equipment and installations charges?

<input type="checkbox"/>	YES (You must attach a full explanation)
<input checked="" type="checkbox"/>	NO

CERTIFICATION STATEMENT

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE TITLE 18, SECTION 1001), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

I certify that the statements made in this form are true and correct to the best of my knowledge and belief, and are made in good faith.

Name of the Cable Operator Comcast Cable Communications, LLC	Signature Working Copy
Date 03/01/15	Title Executive Director of Regulatory Accounting

*See 2015 Equipment and Installation Rates Sheet.

FCC FORM 1205
SCHEDULE D: AVERAGE HOURS PER INSTALLATION

Comcast - Working Copy

Item 4. Upgrade/Downgrade Addressable	
Average Hours per Installation (Attach an Explanation)	
Item 5. Connect VCR - Connect Initial	
Average Hours per Installation (Attach an Explanation)	0.2323
Item 6. Connect VCR - Connect Separate	
Average Hours per Installation (Attach an Explanation)	0.5552
Item 7. Customer Trouble Call	
Average Hours per Installation (Attach an Explanation)	1.0517
Item 8. Activate Pre-Existing Additional Outlet-Initial	
Average Hours per Installation (Attach an Explanation)	0.1639
Item 9. Activate Pre-Existing Additional Outlet-Separate	
Average Hours per Installation (Attach an Explanation)	0.6969
Item 10. Relocate Outlet-Separate	
Average Hours per Installation (Attach an Explanation)	0.9244

FCC FORM 1205
STEP B. INSTALLATION CHARGE

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e10. HSC [Line 7]	N/A	
e11. Average Hours per Installation of Item 4 [Addressable Upgrade/Downgrade]	N/A	
e12. Charge per Installation of Item 4 [e10 x e11]		\$1.9900
e13. HSC [Line 7]	\$35.3459	
e14. Average Hours per Installation of Item 5 [VCR Connect-Initial]	0.2323	
e15. Charge per Installation of Item 5 [e13 x e14]		\$8.2109
e16. HSC [Line 7]	\$35.3459	
e17. Average Hours per Installation of Item 6 [VCR Connect-Separate]	0.5552	
e18. Charge per Installation of Item 6 [e16 x e17]		\$19.6240
e19. HSC [Line 7]	\$35.3459	
e20. Average Hours per Installation of Item 7 [Customer Trouble Call]	1.0517	
e21. Charge per Installation of Item 7 [e19 x e20]		\$37.1733
e22. HSC [Line 7]	\$35.3459	
e23. Average Hours per Installation of Item 8 [Activate Pre-Existing Additional Outlet-Initial]	0.1639	
e24. Charge per Installation of Item 8 [e22 x e23]		\$5.7932
e25. HSC [Line 7]	\$35.3459	
e26. Average Hours per Installation of Item 9 [Activate Pre-Existing Additional Outlet-Separate]	0.6969	
e27. Charge per Installation of Item 9 [e25 x e26]		\$24.6326
e28. HSC [Line 7]	\$35.3459	
e29. Average Hours per Installation of Item 10 [Relocate Outlet-Separate]	0.9244	
e30. Charge per Installation of Item 10 [e28 x e29]		\$32.6738

FCC FORM 1205
SUMMARY SCHEDULE

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Current Equipment and Installation Rates	Permitted	Actual
d. Upgrade/Downgrade Addressable	\$1.99	*
e. Connect VCR - Connect Initial	\$8.21	*
f. Connect VCR - Connect Separate	\$19.62	*
g. Customer Trouble Call	\$37.17	*
h. Activate Pre-Existing Additional Outlet-Initial	\$5.79	*
i. Activate Pre-Existing Additional Outlet-Separate	\$24.63	*
j. Relocate Outlet-Separate	\$32.67	*

* See 2015 Installation and Equipment Rates Sheet

FCC FORM 1205
SCHEDULE C

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SCHEDULE C, LINE B - REMOTE 1

LINE 1. Total Labor Hours for Maintenance / Service of Remotes and Converters	10,925,261 hrs.
LINE 2. Percentage of Line 1 Allocated to Remotes	0.0500
LINE 3. Total Maintenance / Service Hours Allocated to Remotes	546,263
LINE 4. Schedule C, Line C - Total Units in Service-Remote 1	35,736,512
LINE 5. Number of Units-Remote 1 / Total Remote Units [Line 4 / (Line 4 + Line 8)]	1.0000
LINE 6. Total Maintenance / Service Hours Allocated to Remote 1 (Line 3 x Line 5)	546,263 hrs.

SCHEDULE C, LINE B - REMOTE 2

LINE 7. Total Maintenance / Service Hours Allocated to Remotes (Line 3)	546,263 hrs.
LINE 8. Schedule C, Line C - Total Units in Service-Remote 2	
LINE 9. Number of Units-Remote 2 / Total Remote Units [Line 8 / (Line 4 + Line 8)]	
LINE 10. Total Maintenance / Service Hours Allocated to Remote 2 (Line 7 x Line 9)	hrs.

SCHEDULE C, LINE B - CABLE CARD

LINE 11. Total Maintenance / Service Hours Allocate to Cable Card	28,917 hrs.
LINE 12. Schedule C, Line C - Total Units in Service-Cable Card	347,009
LINE 13. Allocation Percentage	1.0000
LINE 14. Total Maintenance / Service Hours Allocated to Cable Card (Line 11 x Line 13)	28,917 hrs.

SCHEDULE C, LINE B - CONVERTER 1

LINE 15. Line 1 above	10,925,261 hrs.
LINE 16. Total Labor Hours Allocated to Converters (Line 1 - Line 3 - Line 12)	10,350,081 hrs.
LINE 17. Schedule C, Line C - Total Units in Service-Converter 1	1,100,728
LINE 18. Number of Units-Converter 1 / Total Converter Units [Line 17 / (Line 17 + Line 21+ Line 25 + Line 29)]	0.01866
LINE 19. Total Maintenance / Service Hours Allocated to Converter 1 (Line 16 x Line 18)	193,098 hrs.

SCHEDULE C, LINE B - CONVERTER 2

LINE 20. Total Labor Hours Allocated to Converters (Line 16)	10,350,081 hrs.
LINE 21. Schedule C, Line C - Total Units in Service-Converter 2	34,635,784
LINE 22. Number of Units-Converter 2 / Total Converter Units [Line 21 / (Line 17 + Line 21 + Line 25 + Line 29)]	0.58706
LINE 23. Total Maintenance / Service Hours Allocated to Converter 2 (Line 20 x Line 22)	6,076,069 hrs.

SCHEDULE C, LINE B - CONVERTER 3

LINE 24. Total Labor Hours Allocated to Converters (Line 16)	10,350,081 hrs.
LINE 25. Schedule C, Line C - Total Units in Service-Converter 3	23,262,681
LINE 26. Number of Units-Converter 3 / Total Converter Units [Line 25 / (Line 17 + Line 21 + line 25 + Line 29)]	0.39429
LINE 27. Total Maintenance / Service Hours Allocated to Converter 3 (Line 24 x Line 26)	4,080,914 hrs.

FCC FORM 1205 CAPITAL ASSETS/GENERAL LEDGER AUDIT REPORT 2014
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PAGE 1

SCHEDULE A INFORMATION	
VEHICLES	778,908.442
TOOLS	402,441.875
Maintenance Facilities	-
OTHER 1	-
OTHER 2	-
SCHEDULE A - TOTAL CAPITAL COSTS	1,181,350.217

SCHEDULE B INFORMATION	
TOTAL AMOUNT	4,781,054.373
SALARIES & BENEFITS	14,322,041
SUPPLIES	-
UTILITIES	-
OTHER TAXES	-
OTHER 1	316,998.009
OTHER 2	358,253.380
SCHEDULE B - ANNUAL OPERATING EXPENSE	5,471,228.303

SCHEDULE C INFORMATION	
REMOTE 1	35,736.512
CABLE CARD	347,009
CONVERTER 1 (BASIC ONLY UNITS)	1,100,728
CONVERTER 2 (DIGITAL)	10,164,338
CONVERTER 2 (HD & HDDVR)	24,412,028
CONVERTER 2 (DVR)	58,918
CONVERTER 3 (DTA)	23,362,681
SCHEDULE C - TOTAL CAPITAL COST	95,082,714

SCHEDULE A INFORMATION	
GROSS BOOK	ACCUMULATED DEPRECIATION
DEFERRED TAXES	NET BOOK
	CURRENT PROVISION
702,081,470	2,915,671
313,947,652	(2,863,615)
-	-
-	-
1,016,029,122	52,056
	165,269,039
	100,779,842

SCHEDULE B INFORMATION	
TOTAL AMOUNT	
4,781,054.373	
14,322,041	
-	
316,998.009	
358,253.380	
5,471,228.303	

SCHEDULE C INFORMATION	
UNITS	GROSS BOOK
ACCUMULATED DEPRECIATION	DEFERRED TAXES
	NET BOOK
	CURRENT PROVISION
206,409,889	147,679,178
22,246,033	17,759,497
192,357,820	158,115,414
1,677,169,687	1,589,777,881
7,355,42,400	4,874,900,570
110,395,267	106,355,857
1,306,256,862	840,159,803
7,734,748,199	77,424,786
385,184,813	2,750,844,946
	1,216,777,555

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SCHEDULE A BREAKDOWN	
SCHEDULE A - COMMON ASSETS	
VEHICLES	
TOOLS	
Maintenance Facilities	
OTHER 1	
OTHER 2	
SCHEDULE A - TOTAL AMOUNTS	

SCHEDULE A - COMCAST SYSTEM ASSETS	
VEHICLES	
TOOLS	
Maintenance Facilities	
OTHER 1	
OTHER 2	
SCHEDULE A - TOTAL AMOUNTS	
GRAND TOTAL SCHEDULE A	

SCHEDULE A - COMCAST SYSTEM ASSETS	
GROSS BOOK	ACCUMULATED DEPRECIATION
778,908,342	702,081,470
402,441,875	313,947,652
-	-
1,181,350,217	1,016,029,122
1,181,350,217.00	1,016,029,122.00

SCHEDULE A - COMCAST SYSTEM ASSETS	
BOOK COST	BOOK ACCUM.
402,441,875	313,947,652
778,908,342	702,081,470
-	-
1,181,350,217	1,016,029,122
TOTAL SYSTEM ASSETS	

DEFERRED TAX CALCULATION	
TOOLS	NET BOOK
VEHICLES	NET TAX
BUILDINGS	BOOK LESS TAX
CAPITALIZED VEHICLE LEASES	NET TAX RATE
TOTALS	DEF TAXES
TOOLS	88,494,223
VEHICLES	95,736,546
BUILDINGS	(7,242,321)
CAPITALIZED VEHICLE LEASES	0.3954
TOTALS	(2,863,615)

NET TAX RATE = [(FEDERAL TAX + STATE TAX) - (FEDERAL TAX * STATE TAX)]	STATE TAX:	NET TAX RATE:
	0.3500	0.3954

NET TAX RATE = [(FEDERAL TAX + STATE TAX) - (FEDERAL TAX * STATE TAX)]

FEDERAL TAX: _____ STATE TAX: _____

NET TAX RATE: _____

STATE TAX: _____

NET TAX RATE: _____

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SCHEDULE B BREAKDOWN		TOTAL AMOUNT
SCHEDULE B - COMMON EXPENSES		
SALARIES & BENEFITS		4,781,054.373
SUPPLIES		14,922.041
UTILITIES		-
OTHER TAXES		-
OTHER 1		-
OTHER 2		-
SCHEDULE B TOTAL - COMMON EXPENSES		
SCHEDULE B - COMCAST SYSTEM EXPENSES		TOTAL AMOUNT
SALARIES & BENEFITS		2,646,557,698.73
SUPPLIES		185,246,696.19
UTILITIES		-
OTHER TAXES		-
OTHER 1		316,998.009
OTHER 2		358,253.880
SCHEDULE B TOTALS - COMCAST SYSTEM EXPENSES		5,471,228.303
GRAND TOTAL SCHEDULE B - OPERATING EXPENSE		5,471,228.303
SCHEDULE B - COMCAST SYSTEM EXPENSES		TOTAL AMOUNT
SALARIES-REGULAR		2,646,557,698.73
SALARIES-OVERTIME		185,246,696.19
SALARIES-BONUSES		205,955,084.70
SALARIES-VACATION		310,594,056.81
COMMISSIONS		377,879,943.80
UTILITIES		UTILITIES
CONTRACT LABOR		227,272,706.06
BUILDING MAINTENANCE		OTHER1
M & R-CONVERTER		89,725,303.26
RENTAL/LEASE EXPENSE		OTHER1
VEHICLES-GAS & OIL		122,690,221.90
VEHICLES-REPAIRS & MAINTENANCE		132,593,277.85
EMPLOYEE BENEFITS		102,970,379.89
PAYOUT TAXES		733,517,629.83
M & R-EQUIPMENT		321,303,262.84
PARTS SUPPLIES SMALL TOOLS		SUPPLIES
PROPERTY TAXES		14,922,041.07
INSURANCE		OTHER1 TAXES
TOTAL COMCAST CABLE SYSTEMS		5,471,228.302.93
		OTHER2

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SCHEDULE C BREAKDOWN	
SCHEDULE C - COMMON ASSETS	
REMOTE 1	
REMOTE 2	
REMOTE 3	
CONVERTER 1 (BASIC ONLY UNITS)	
CONVERTER 2 (ALL OTHER EXCLUDING HD)	
CONVERTER 3 (HD)	
CONVERTER 2 (DVR)	
SCHEDULE C - TOTAL AMOUNTS	

SCHEDULE C - COMCAST SYSTEM ASSETS	
UNITS	GROSS BOOK
ACCUMULATED DEPRECIATION	DEFERRED TAXES
35,736,512	206,409,889
347,009	22,246,033
1,100,728	192,557,820
10,164,838	1,677,769,687
24,412,028	7,351,42,400
58,918	110,395,267
23,262,681	1,306,256,962
95,082,714	10,870,777,958
95,082,714	10,870,777,958

SCHEDULE C - COMCAST SYSTEM ASSETS	
BOOK COST	BOOK ACCUM.
NET BOOK	BOOK PROVISION
206,409,889	147,679,178
4,094,188,645	2,949,329,988
22,246,033	17,559,497
-	-
192,557,820	158,115,414
-	-
158,115,414	34,442,406
-	-
1,925,071,282	1,335,882,473
1,677,769,687	87,991,806
1,589,777,981	4,039,410
110,395,267	466,097,059
840,159,803	245,084,383
10,870,777,958	3,136,029,759

SCHEDULE C - DEFERRED TAX CALCULATION	
NET BOOK	NET TAX
BOOK LESS TAX	NET TAX RATE
58,730,711	12,950,099
1,144,559,357	758,869,753
4,486,536	3,804,171
34,442,406	22,725,102
-	-
1,335,882,473	941,698,150
87,991,806	1,677,769,687
4,039,410	10,870,777,958
466,097,059	3,136,029,759

NET TAX RATE CALCULATION = [(FEDERAL TAX + STATE TAX) - (FEDERAL TAX * STATE TAX)] / FEDERAL TAX: _____ 0.3500 STATE TAX: _____ 0.0699 NET TAX RATE: _____ 0.3954

Commonwealth of Massachusetts
Department of Telecommunications and Cable
Cable Television Division
Docket No. DTC 15-3

D.T.C. 1-2

On the cover sheet for each FCC Form 1240 and Form 1205 it states that the Maximum Permitted Rate (“MPR”) is currently noted as the Operator Selected Rate (“OSR”). To update the FCC Forms 1240 and Form 1205 with the correct OSR, please provide a document detailing the most recently approved MPR, Franchise Related Cost (“FRC”), OSR and the proposed MPR, FRC, OSR for each regulated Massachusetts franchise.

RESPONSE:

Attached Exhibit 1-2 details the most recently approved MPR, Franchise Related Cost (“FRC”), and OSR and proposed MPR, FRC, and OSR for each regulated Massachusetts franchise.

RESPONSIBLE WITNESS: Mark Renaud

Town	Most Recently Approved MPR & FRC			Prior Rate Charged			PROPOSED MPR & FRC			Current Rate Charged		
	MPR	FRC	Total	Rate	BTV Fee	FRC	MPR	FRC	Total	Rate	BTV Fee	FRC
Acuishnet	\$ 22.25	\$ 0.31	\$ 22.56	\$ 12.00	\$ 3.25	\$ 0.31	\$ 15.56	\$ 24.89	\$ 0.31	\$ 25.20	\$ 12.50	\$ 0.31
Agawam	\$ 10.32	\$ 0.14	\$ 10.46	\$ 5.24	\$ 3.25	\$ 0.14	\$ 8.63	\$ 14.19	\$ 0.14	\$ 14.33	\$ 5.25	\$ 0.14
Amesbury	\$ 21.68	\$ 0.33	\$ 22.01	\$ 10.75	\$ 3.25	\$ 0.33	\$ 14.33	\$ 25.91	\$ 0.33	\$ 26.24	\$ 10.75	\$ 0.33
Amherst	\$ 16.05	\$ 0.87	\$ 16.92	\$ 11.20	\$ 3.25	\$ 0.87	\$ 15.32	\$ 19.58	\$ 0.86	\$ 20.44	\$ 11.25	\$ 0.86
Ashland	\$ 22.01	\$ 1.15	\$ 23.16	\$ 9.75	\$ 3.25	\$ 1.15	\$ 14.15	\$ 26.80	\$ 1.01	\$ 27.81	\$ 10.00	\$ 1.01
Attleboro	\$ 19.65	\$ 0.90	\$ 20.55	\$ 9.50	\$ 3.25	\$ 0.90	\$ 13.65	\$ 22.36	\$ 0.92	\$ 23.28	\$ 10.25	\$ 0.92
Avon	\$ 15.67	\$ 0.50	\$ 16.17	\$ 8.04	\$ 3.25	\$ 0.50	\$ 11.79	\$ 18.17	\$ 0.51	\$ 18.68	\$ 8.75	\$ 0.51
Barnstable	\$ 19.65	\$ 0.01	\$ 19.66	\$ 11.75	\$ 3.25	\$ 0.01	\$ 15.01	\$ 22.29	\$ 0.01	\$ 22.30	\$ 12.00	\$ 0.01
Bellingham	\$ 23.05	\$ 0.93	\$ 23.98	\$ 9.75	\$ 3.25	\$ 0.93	\$ 13.93	\$ 28.05	\$ 0.80	\$ 28.85	\$ 10.00	\$ 0.80
Berkley	\$ 18.46	\$ 0.62	\$ 19.08	\$ 10.00	\$ 3.25	\$ 0.62	\$ 13.87	\$ 20.40	\$ 0.62	\$ 21.02	\$ 10.25	\$ 0.62
Beverly	\$ 16.51	\$ 0.35	\$ 16.86	\$ 8.70	\$ 3.25	\$ 0.35	\$ 12.30	\$ 19.34	\$ 0.36	\$ 19.70	\$ 9.00	\$ 0.36
Billerica	\$ 20.30	\$ 0.46	\$ 20.76	\$ 9.00	\$ 3.25	\$ 0.46	\$ 12.71	\$ 25.17	\$ 0.45	\$ 25.62	\$ 9.00	\$ 0.45
Blackstone	\$ 19.69	\$ 0.48	\$ 20.17	\$ 11.75	\$ 3.25	\$ 0.48	\$ 15.48	\$ 22.01	\$ 0.49	\$ 22.50	\$ 11.75	\$ 0.49
Bridgewater	\$ 60.02	\$ -	\$ 60.02	\$ 17.95	\$ 3.25	\$ -	\$ 21.20	\$ 61.48	\$ -	\$ 61.48	\$ 18.00	\$ -
Brockton	\$ 17.25	\$ 0.12	\$ 17.37	\$ 8.33	\$ 3.25	\$ 0.12	\$ 11.70	\$ 20.48	\$ 0.12	\$ 20.60	\$ 8.50	\$ 0.12
Buckland	\$ 17.97	\$ 1.06	\$ 19.03	\$ 12.66	\$ 3.25	\$ 1.06	\$ 16.97	\$ 21.53	\$ 1.06	\$ 22.59	\$ 12.75	\$ 1.06
Cambridge	\$ 15.44	\$ 0.67	\$ 16.11	\$ 7.04	\$ 3.25	\$ 0.67	\$ 10.96	\$ 18.25	\$ 0.67	\$ 18.92	\$ 7.50	\$ 0.67
Carlisle	\$ 21.31	\$ 0.76	\$ 22.07	\$ 12.25	\$ 3.25	\$ 0.76	\$ 16.26	\$ 25.33	\$ 0.75	\$ 26.25	\$ 12.25	\$ 0.75
Chatham	\$ 19.89	\$ 0.46	\$ 20.35	\$ 11.75	\$ 3.25	\$ 0.46	\$ 15.46	\$ 22.57	\$ 0.46	\$ 23.03	\$ 12.00	\$ 0.46
Chelmsford	\$ 23.64	\$ 0.67	\$ 24.31	\$ 11.25	\$ 3.25	\$ 0.67	\$ 15.17	\$ 28.04	\$ 0.65	\$ 28.69	\$ 12.00	\$ 0.65
Clinton	\$ 17.58	\$ 0.59	\$ 18.17	\$ 7.63	\$ 3.25	\$ 0.59	\$ 11.47	\$ 21.66	\$ 0.62	\$ 22.28	\$ 8.00	\$ 0.62
Cohasset	\$ 17.66	\$ 0.16	\$ 17.82	\$ 8.43	\$ 3.25	\$ 0.16	\$ 11.84	\$ 20.71	\$ 0.16	\$ 20.87	\$ 9.00	\$ 0.16
Concord	\$ 21.25	\$ 0.58	\$ 21.83	\$ 11.74	\$ 3.25	\$ 0.58	\$ 15.57	\$ 25.58	\$ 0.56	\$ 26.14	\$ 12.25	\$ 0.56
Danvers	\$ 21.10	\$ 0.88	\$ 21.98	\$ 11.75	\$ 3.25	\$ 0.88	\$ 15.88	\$ 24.85	\$ 0.85	\$ 25.70	\$ 12.00	\$ 0.85
Dartmouth	\$ 17.93	\$ 0.62	\$ 18.55	\$ 9.50	\$ 3.25	\$ 0.62	\$ 13.37	\$ 20.05	\$ 0.62	\$ 20.67	\$ 10.00	\$ 0.62
Deerfield	\$ 11.38	\$ 1.02	\$ 12.40	\$ 6.58	\$ 3.25	\$ 1.02	\$ 10.85	\$ 15.09	\$ 0.02	\$ 15.11	\$ 6.75	\$ 0.02
Dennis	\$ 19.21	\$ 0.38	\$ 19.59	\$ 11.75	\$ 3.25	\$ 0.38	\$ 15.38	\$ 21.81	\$ 0.38	\$ 22.19	\$ 12.00	\$ 0.38
Dighton	\$ 18.33	\$ 0.49	\$ 18.82	\$ 9.75	\$ 3.25	\$ 0.49	\$ 13.49	\$ 20.60	\$ 0.48	\$ 21.08	\$ 10.00	\$ 0.48
Dover	\$ 18.11	\$ 2.33	\$ 20.44	\$ 5.55	\$ 3.25	\$ 2.33	\$ 11.13	\$ 22.26	\$ 1.90	\$ 24.16	\$ 6.00	\$ 1.90
Dracut	\$ 23.61	\$ 0.09	\$ 23.70	\$ 7.25	\$ 3.25	\$ 0.09	\$ 10.59	\$ 29.30	\$ 0.10	\$ 29.40	\$ 7.75	\$ 0.10
Duxbury	\$ 21.33	\$ 0.18	\$ 21.51	\$ 14.75	\$ 3.25	\$ 0.18	\$ 18.18	\$ 23.45	\$ 0.16	\$ 23.62	\$ 15.00	\$ 0.16
East Bridgewater	\$ 16.74	\$ 0.02	\$ 16.76	\$ 9.50	\$ 3.25	\$ 0.02	\$ 12.77	\$ 19.37	\$ 0.02	\$ 19.39	\$ 10.25	\$ 0.02
Eastham	\$ 17.61	\$ 0.15	\$ 17.76	\$ 9.00	\$ 3.25	\$ 0.15	\$ 12.40	\$ 20.89	\$ 0.15	\$ 21.04	\$ 9.25	\$ 0.15
Easton	\$ 17.84	\$ 0.31	\$ 18.15	\$ 11.00	\$ 3.25	\$ 0.31	\$ 14.56	\$ 18.84	\$ 0.27	\$ 19.11	\$ 11.00	\$ 0.27
Essex	\$ 16.67	\$ 0.39	\$ 17.06	\$ 12.50	\$ 3.25	\$ 0.39	\$ 16.14	\$ 17.84	\$ 0.40	\$ 18.24	\$ 12.00	\$ 0.40
Fairhaven	\$ 22.54	\$ 0.17	\$ 22.71	\$ 12.50	\$ 3.25	\$ 0.17	\$ 15.92	\$ 25.11	\$ 0.18	\$ 25.29	\$ 12.50	\$ 0.18
Fall River	\$ 17.54	\$ 0.35	\$ 17.89	\$ 9.00	\$ 3.25	\$ 0.35	\$ 12.60	\$ 19.77	\$ 0.36	\$ 20.12	\$ 9.50	\$ 0.36
Falmouth	N/A	N/A	N/A	12.25	\$ 3.25	\$ 0.31	15.81	\$ 22.99	\$ 0.31	\$ 22.60	\$ 12.50	\$ 0.31
Freetown	\$ 18.55	\$ 0.25	\$ 18.78	\$ 10.25	\$ 3.25	\$ 0.49	\$ 12.75	\$ 32.53	\$ 0.49	\$ 33.02	\$ 9.75	\$ 0.49
Gardner	\$ 16.15	\$ 0.09	\$ 16.24	\$ 11.75	\$ 3.25	\$ 0.09	\$ 15.09	\$ 19.99	\$ 0.25	\$ 20.24	\$ 10.25	\$ 0.25
Gloucester	\$ 18.77	\$ 0.20	\$ 18.92	\$ 12.99	\$ 3.25	\$ 0.20	\$ 16.44	\$ 19.19	\$ 0.20	\$ 19.39	\$ 13.00	\$ 0.20
Granby	\$ 13.65	\$ 0.83	\$ 14.48	\$ 8.55	\$ 3.25	\$ 0.83	\$ 12.63	\$ 17.29	\$ 0.74	\$ 18.03	\$ 8.75	\$ 0.74
Greenfield	\$ 18.48	\$ 0.44	\$ 18.92	\$ 10.72	\$ 3.25	\$ 0.44	\$ 14.41	\$ 23.09	\$ 0.43	\$ 23.52	\$ 11.25	\$ 0.43
Groveland	\$ 21.25	\$ 0.60	\$ 21.85	\$ 9.50	\$ 3.25	\$ 0.60	\$ 13.35	\$ 25.29	\$ 0.59	\$ 25.83	\$ 9.50	\$ 0.59
Hanover	\$ 18.54	\$ 0.19	\$ 18.73	\$ 8.70	\$ 3.25	\$ 0.19	\$ 12.14	\$ 19.14	\$ 0.19	\$ 21.90	\$ 9.00	\$ 0.19
Hanson	\$ 19.16	\$ 1.12	\$ 20.28	\$ 9.00	\$ 3.25	\$ 1.12	\$ 13.37	\$ 22.89	\$ -	\$ 22.89	\$ 9.50	\$ 0.20
Harwich	\$ 19.68	\$ 0.36	\$ 20.04	\$ 11.74	\$ 3.25	\$ 0.36	\$ 15.35	\$ 22.32	\$ 0.37	\$ 22.69	\$ 12.00	\$ 0.37
Hillfield	\$ 11.11	\$ 0.83	\$ 11.94	\$ 6.29	\$ 3.25	\$ 0.83	\$ 10.37	\$ 14.95	\$ 0.84	\$ 15.79	\$ 6.50	\$ 0.84
Haverhill	\$ 19.37	\$ 0.08	\$ 19.45	\$ 7.59	\$ 3.25	\$ 0.08	\$ 10.92	\$ 23.90	\$ 0.08	\$ 23.98	\$ 8.00	\$ 0.08

Town	Most Recently Approved MPR & FRC	Total	Rate	BTV Fee	Total	MPR	FRC	Total	Rate	BTV Fee	Total	Current Rate Charged		
	MPR	FRC										FRC	Total	
Hingham	\$ 17.48	\$ 0.97	\$ 18.45	\$ 8.90	\$ 3.25	\$ 13.12	\$ 0.97	\$ 19.59	\$ 0.84	\$ 20.53	\$ 9.00	\$ 5.00	\$ 0.84	\$ 14.84
Holliston	\$ 13.12	\$ 1.45	\$ 14.57	\$ 9.85	\$ 3.25	\$ 14.55	\$ 1.45	\$ 15.46	\$ 1.05	\$ 16.51	\$ 10.00	\$ 5.00	\$ 1.05	\$ 16.05
Holyoke	\$ 10.29	\$ 0.33	\$ 10.62	\$ 5.29	\$ 3.25	\$ 0.33	\$ 8.87	\$ 14.13	\$ 0.34	\$ 14.47	\$ 5.50	\$ 5.00	\$ 0.34	\$ 10.84
Hopedale	\$ 29.78	\$ 0.10	\$ 29.70	\$ 16.70	\$ 3.25	\$ 0.10	\$ 20.5	\$ 29.51	\$ 0.11	\$ 29.52	\$ 17.00	\$ 5.00	\$ 0.11	\$ 22.11
Hull	\$ 17.83	\$ 0.20	\$ 18.03	\$ 8.19	\$ 3.25	\$ 0.20	\$ 11.64	\$ 20.90	\$ 0.19	\$ 21.09	\$ 9.00	\$ 5.00	\$ 0.19	\$ 14.19
Lakeville	\$ 17.62	\$ 0.64	\$ 18.26	\$ 9.75	\$ 3.25	\$ 0.64	\$ 13.64	\$ 20.70	\$ 0.69	\$ 21.39	\$ 10.00	\$ 5.00	\$ 0.69	\$ 15.69
Lancaster	\$ 17.02	\$ 0.51	\$ 17.53	\$ 7.87	\$ 3.25	\$ 0.51	\$ 11.63	\$ 20.83	\$ 0.53	\$ 21.36	\$ 8.00	\$ 5.00	\$ 0.53	\$ 13.53
Leominster	\$ 19.92	\$ 0.31	\$ 20.23	\$ 10.00	\$ 3.25	\$ 0.31	\$ 13.56	\$ 22.97	\$ 0.30	\$ 23.27	\$ 10.00	\$ 5.00	\$ 0.30	\$ 15.30
Longmeadow	\$ 12.69	\$ 0.48	\$ 13.17	\$ 7.90	\$ 3.25	\$ 0.48	\$ 11.63	\$ 16.14	\$ 0.49	\$ 16.63	\$ 8.00	\$ 5.00	\$ 0.49	\$ 13.49
Lowell	\$ 24.42	\$ 0.31	\$ 24.73	\$ 12.00	\$ 3.25	\$ 0.31	\$ 15.56	\$ 28.62	\$ 0.10	\$ 28.72	\$ 12.00	\$ 5.00	\$ 0.10	\$ 17.10
Manchester by the Sea	\$ 15.06	\$ 0.23	\$ 15.29	\$ 11.75	\$ 3.25	\$ 0.23	\$ 15.23	\$ 25.52	\$ 0.24	\$ 25.76	\$ 10.00	\$ 5.00	\$ 0.24	\$ 15.24
Marblehead	\$ 18.83	\$ 0.82	\$ 19.65	\$ 7.16	\$ 3.25	\$ 0.82	\$ 11.23	\$ 23.09	\$ 0.81	\$ 23.90	\$ 7.50	\$ 5.00	\$ 0.81	\$ 13.31
Maynard	\$ 24.93	\$ 1.86	\$ 26.79	\$ 11.99	\$ 3.25	\$ 1.86	\$ 17.10	\$ 29.56	\$ 1.64	\$ 31.20	\$ 12.25	\$ 5.00	\$ 1.64	\$ 18.89
Medway	\$ 16.23	\$ -	\$ 16.23	\$ 9.75	\$ 3.25	\$ -	\$ 13.00	\$ 19.84	\$ -	\$ 19.84	\$ 10.00	\$ 5.00	\$ -	\$ 15.00
Mendon	\$ 59.25	\$ 0.79	\$ 60.04	\$ 18.20	\$ 3.25	\$ 0.79	\$ 22.24	\$ 58.32	\$ 0.67	\$ 58.99	\$ 18.50	\$ 5.00	\$ 0.67	\$ 24.17
Merimac	\$ 19.22	\$ 0.42	\$ 19.64	\$ 9.25	\$ 3.25	\$ 0.42	\$ 12.92	\$ 22.12	\$ 0.41	\$ 22.53	\$ 10.00	\$ 5.00	\$ 0.41	\$ 15.41
Middleton	\$ 18.17	\$ 0.57	\$ 18.74	\$ 9.00	\$ 3.25	\$ 0.57	\$ 12.82	\$ 21.08	\$ 0.50	\$ 21.58	\$ 9.00	\$ 5.00	\$ 0.50	\$ 14.50
Milford	\$ 13.65	\$ 0.74	\$ 14.39	\$ 6.43	\$ 3.25	\$ 0.74	\$ 10.42	\$ 16.32	\$ 0.65	\$ 16.97	\$ 7.00	\$ 5.00	\$ 0.65	\$ 12.65
Mills	\$ 21.33	\$ 1.21	\$ 22.54	\$ 11.25	\$ 3.25	\$ 1.21	\$ 15.71	\$ 24.47	\$ 1.21	\$ 25.68	\$ 11.75	\$ 5.00	\$ 1.21	\$ 17.96
Milton	\$ 16.14	\$ 0.10	\$ 16.24	\$ 7.39	\$ 3.25	\$ 0.10	\$ 10.74	\$ 18.91	\$ 0.10	\$ 19.01	\$ 7.50	\$ 5.00	\$ 0.10	\$ 12.60
Montague	\$ 20.94	\$ 0.10	\$ 21.04	\$ 8.31	\$ 3.25	\$ 0.10	\$ 11.66	\$ 28.43	\$ 0.47	\$ 28.90	\$ 9.00	\$ 5.00	\$ 0.47	\$ 14.47
New Bedford	\$ 18.20	\$ 0.19	\$ 18.39	\$ 10.50	\$ 3.25	\$ 0.19	\$ 13.94	\$ 19.95	\$ 0.20	\$ 20.15	\$ 10.50	\$ 5.00	\$ 0.20	\$ 15.70
Newbury	\$ 20.43	\$ 0.42	\$ 20.85	\$ 9.50	\$ 3.25	\$ 0.42	\$ 13.27	\$ 23.89	\$ 0.42	\$ 24.31	\$ 10.00	\$ 5.00	\$ 0.42	\$ 15.42
Newport	\$ 18.03	\$ 0.22	\$ 18.25	\$ 9.75	\$ 3.25	\$ 0.22	\$ 13.22	\$ 21.09	\$ 0.22	\$ 21.31	\$ 10.00	\$ 5.00	\$ 0.22	\$ 15.22
Norfolk	\$ 21.02	\$ 0.64	\$ 21.66	\$ 10.75	\$ 3.25	\$ 0.64	\$ 14.64	\$ 23.45	\$ 0.58	\$ 24.03	\$ 10.75	\$ 5.00	\$ 0.58	\$ 16.33
North Andover	\$ 22.99	\$ 0.21	\$ 23.20	\$ 12.25	\$ 3.25	\$ 0.21	\$ 15.71	\$ 26.29	\$ 0.05	\$ 26.34	\$ 12.25	\$ 5.00	\$ 0.05	\$ 17.30
Northampton	\$ 11.29	\$ 0.66	\$ 11.95	\$ 6.13	\$ 3.25	\$ 0.66	\$ 10.04	\$ 15.27	\$ 0.67	\$ 15.94	\$ 6.50	\$ 5.00	\$ 0.67	\$ 12.17
Norton	\$ 20.05	\$ 0.09	\$ 20.14	\$ 12.00	\$ 3.25	\$ 0.09	\$ 15.34	\$ 22.01	\$ 0.09	\$ 22.10	\$ 12.25	\$ 5.00	\$ 0.09	\$ 17.34
Norwell	\$ 17.67	\$ 0.11	\$ 17.78	\$ 7.60	\$ 3.25	\$ 0.11	\$ 10.96	\$ 21.03	\$ 0.11	\$ 21.14	\$ 8.00	\$ 5.00	\$ 0.11	\$ 13.11
Oceanside	\$ 14.77	\$ 0.11	\$ 14.88	\$ 6.48	\$ 3.25	\$ 0.11	\$ 9.84	\$ 18.09	\$ 0.12	\$ 18.21	\$ 7.00	\$ 5.00	\$ 0.12	\$ 12.12
Palmer	\$ 16.60	\$ 0.31	\$ 16.91	\$ 11.29	\$ 3.25	\$ 0.31	\$ 14.85	\$ 20.40	\$ 0.31	\$ 20.71	\$ 11.75	\$ 5.00	\$ 0.31	\$ 17.06
Peabody	\$ 18.80	\$ 1.35	\$ 20.15	\$ 12.00	\$ 3.25	\$ 1.35	\$ 16.60	\$ 20.84	\$ 0.76	\$ 21.60	\$ 12.50	\$ 5.00	\$ 0.76	\$ 18.26
Pelham	\$ 17.31	\$ -	\$ 17.31	\$ 12.02	\$ 3.25	\$ -	\$ 15.27	\$ 21.00	\$ -	\$ 21.00	\$ 12.25	\$ 5.00	\$ -	\$ 17.25
Plainville	\$ 20.42	\$ 0.68	\$ 21.10	\$ 10.75	\$ 3.25	\$ 0.68	\$ 14.68	\$ 23.28	\$ 0.30	\$ 23.58	\$ 11.75	\$ 5.00	\$ 0.30	\$ 17.05
Provincetown	\$ 17.52	\$ 0.44	\$ 17.96	\$ 8.75	\$ 3.25	\$ 0.44	\$ 12.44	\$ 20.89	\$ 0.45	\$ 21.34	\$ 9.25	\$ 5.00	\$ 0.45	\$ 14.70
Quincy	\$ 18.79	\$ 0.01	\$ 18.80	\$ 7.07	\$ 3.25	\$ 0.01	\$ 10.33	\$ 22.79	\$ 0.01	\$ 22.80	\$ 7.50	\$ 5.00	\$ 0.01	\$ 12.51
Randolph	\$ 15.03	\$ 1.73	\$ 16.76	\$ 6.92	\$ 3.25	\$ 1.73	\$ 11.90	\$ 17.75	\$ 1.75	\$ 19.50	\$ 7.50	\$ 5.00	\$ 1.75	\$ 14.25
Rehoboth	\$ 19.08	\$ 0.71	\$ 19.79	\$ 10.25	\$ 3.25	\$ 0.71	\$ 14.21	\$ 21.36	\$ 0.72	\$ 22.08	\$ 10.25	\$ 5.00	\$ 0.72	\$ 15.97
Rockport	\$ 17.37	\$ 0.21	\$ 17.58	\$ 11.75	\$ 3.25	\$ 0.21	\$ 15.21	\$ 18.73	\$ 0.21	\$ 18.94	\$ 12.00	\$ 5.00	\$ 0.21	\$ 17.21
Salem	\$ 21.42	\$ 0.01	\$ 21.43	\$ 12.00	\$ 3.25	\$ 0.01	\$ 15.26	\$ 24.30	\$ 0.02	\$ 24.32	\$ 12.25	\$ 5.00	\$ 0.02	\$ 17.27
Saugus	\$ 14.34	\$ 0.48	\$ 14.82	\$ 7.67	\$ 3.25	\$ 0.48	\$ 11.40	\$ 16.66	\$ 0.48	\$ 17.14	\$ 7.75	\$ 5.00	\$ 0.48	\$ 13.23
Scituate	\$ 17.63	\$ 0.05	\$ 17.68	\$ 8.99	\$ 3.25	\$ 0.05	\$ 12.29	\$ 20.27	\$ 0.05	\$ 20.32	\$ 9.00	\$ 5.00	\$ 0.05	\$ 14.05
Sharon	\$ 18.26	\$ 0.49	\$ 18.75	\$ 10.52	\$ 3.25	\$ 0.49	\$ 14.26	\$ 21.31	\$ 0.50	\$ 21.81	\$ 10.50	\$ 5.00	\$ 0.50	\$ 16.00
Somerset	\$ 18.57	\$ 0.48	\$ 19.05	\$ 12.00	\$ 3.25	\$ 0.48	\$ 15.73	\$ 22.02	\$ 0.54	\$ 22.56	\$ 12.25	\$ 5.00	\$ 0.54	\$ 17.79
South Hadley	\$ 9.98	\$ 0.44	\$ 10.42	\$ 4.76	\$ 3.25	\$ 0.44	\$ 8.45	\$ 14.03	\$ 0.44	\$ 14.47	\$ 5.00	\$ 5.00	\$ 0.44	\$ 10.44
Southwick	\$ 13.56	\$ 0.16	\$ 13.72	\$ 8.58	\$ 3.25	\$ 0.16	\$ 11.99	\$ 17.12	\$ 0.16	\$ 17.28	\$ 8.75	\$ 5.00	\$ 0.16	\$ 13.91
Springfield	\$ 10.04	\$ -	\$ 10.04	\$ 4.72	\$ 3.25	\$ -	\$ 7.97	\$ 13.92	\$ -	\$ 13.92	\$ 5.00	\$ 5.00	\$ -	\$ 10.00
Stow	\$ 22.30	\$ 1.47	\$ 23.77	\$ 13.25	\$ 3.25	\$ 1.47	\$ 17.97	\$ 25.99	\$ 1.31	\$ 27.30	\$ 13.25	\$ 5.00	\$ 1.31	\$ 19.56
Sunderland	\$ 11.58	\$ 1.42	\$ 13.00	\$ 6.66	\$ 3.25	\$ 1.42	\$ 11.33	\$ 15.26	\$ 0.05	\$ 15.31	\$ 6.75	\$ 5.00	\$ 0.05	\$ 11.80
Swansea	\$ 20.21	\$ -	\$ 20.21	\$ 11.25	\$ 3.25	\$ -	\$ 14.50	\$ 22.20	\$ 0.17	\$ 22.37	\$ 12.25	\$ 5.00	\$ 0.17	\$ 17.42

Commonwealth of Massachusetts
Department of Telecommunications and Cable
Cable Television Division
Docket No. DTC 15-3

D.T.C. 1-3 Please provide complete and detailed documentation supporting the retransmission consent fees cost included in both the true-up period and projected period on the FCC Forms 1240 for each regulated Massachusetts franchise. As a part of Comcast's response, include a list of each channel electing retransmission consent fees and the amount of each fee.

(REDACTED)

RESPONSE:

Please see the attached summary (Exhibit 1-3 -Redacted) supporting the retransmission consent fee costs included in both the true-up period and projected period on the FCC Forms 1240 for each regulated Massachusetts franchise.

RESPONSIBLE WITNESS: Joseph Lance

Commonwealth of Massachusetts
Department of Telecommunications and Cable
Cable Television Division
Docket No. DTC 15-3

D.T.C. 1-4 Please provide a detailed narrative explaining the methodology used by Comcast to determine the retransmission consent fees applicable to the rate for each regulated Massachusetts franchise.

RESPONSE:

In order to calculate the retransmission consent fees, Comcast utilizes the per-subscriber cost identified in each broadcaster's monthly invoice. The per-subscriber costs on the invoice are specific to the cable system that services the respective Local Franchising Authority identified on each FCC Form 1240. This methodology is the same as was used in prior period filings.

RESPONSIBLE WITNESS: Joseph Lance

Commonwealth of Massachusetts
Department of Telecommunications and Cable
Cable Television Division
Docket No. DTC 15-3

D.T.C. 1-5 Please provide a detailed narrative with supporting documentation explaining the methodology Comcast used to estimate the subscriber count for the projected period on its FCC Forms 1240.

RESPONSE:

Comcast used a 12-month average of subscribers from July, 2014 through June, 2015, which coincides with the true-up period, to estimate the subscriber count for the projected period on its FCC Forms 1240.

RESPONSIBLE WITNESS: Mark Renaud

Commonwealth of Massachusetts
Department of Telecommunications and Cable
Cable Television Division
Docket No. DTC 15-3

D.T.C. 1-6

On each Exhibit II enclosed with the FCC Forms 1240, Comcast identifies three items that comprise the total rate, including "Basic," "Broadcast TV Fee," and "FRC." Please define "Broadcast TV Fee" as presented on Exhibit II, and explain how Comcast calculated the amount included in the "Proposed OSR" column. In this explanation, please detail the relationship, if any, between the amount shown for "Broadcast TV Fee" in the "Proposed OSR" column of Exhibit II, and the per subscriber costs for the projected period as itemized for programming, copyright and retransmission costs in Exhibit V enclosed with the FCC Forms 1240.

RESPONSE:

The Broadcast TV Fee is an itemized charge to defray a portion of the increasing costs of retransmitting broadcast television signals. With regard to the amount of the "Broadcast TV Fee" noted in the "Proposed OSR" column of Exhibit II, this figure is the "maximum" calculation of broadcast retransmission consent costs, and it may exceed the amount actually itemized on the subscriber bill. This figure was calculated by multiplying the per subscriber retransmission consent fees for the projected period (identified in Exhibit V as the "Retrans Cost Rate") by the 7.5% Markup noted Worksheet 7: Line 704 for the Projected Period within the FCC Form 1240. The Broadcast TV Fee calculation does not include the additional per subscriber costs in Exhibit V, such as the "Programming Cost Rate" or the "Copyright Cost Rate."

RESPONSIBLE WITNESS: Joseph Lance